

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

JONATHAN TROTTA and MELISSA
TROTTA,

Plaintiffs,

v.

ARMELLINI EXPRESS LINES,
INC., MABRAND CARRIERS
GROUP, INC. ORLANDO DELGADO,
AND JOHN DOES 1-X,
(fictitiously Named
Defendants),

Defendants.

Civil Action No. _____

PETITION FOR REMOVAL

Removing Defendant, Mabrand Carriers Group, Inc., states as follows:

1. Plaintiffs, Jonathan Trotta and Melissa Trotta, commenced an action against the removing Defendant, Mabrand Carriers Group, Inc., in the Superior Court of New Jersey, County of Essex, bearing docket number ESX-L-996-17. (**See Exhibit A attached**)

2. An Amended Complaint naming removing Defendant Mabrand Carriers Group, Inc. was filed on or about July 13, 2017 and served on Mabrand Carriers Group, Inc. on January 1, 2018.

3. Plaintiffs are residents of the Commonwealth of Pennsylvania.

4. Defendant Mabrand Carriers Group, Inc. is a corporation organized and existing under the laws of the State of Florida with its principal place of business located in Parkland, Florida.

5. Defendant Armellini Express Lines, Inc. is a corporation organized and existing under the laws of the State of Florida with a principle place of business located in Florida.

6. Defendant Orlando Delgado is alleged to be an employee of Mabrand Carriers Group, Inc. Mabrand Carriers Group, Inc. had no employee by that name at any time. Moreover, on February 7, 2015, (the date of the accident at issue), Mabrand Carriers Group, Inc. did not employ any drivers of its trucks who were residents of the Commonwealth of Pennsylvania who would be destructive of diversity.

7. The amount in controversy is more than \$75,000.00.

8. Armelli Express Lines, Inc. consents to this Removal.

9. Accordingly, this Court has diversity jurisdiction of this action pursuant to 28 U.S.C. §1332, and Defendant is entitled to removal of this action pursuant to 28 U.S.C. §1441.

WHEREFORE, removing Defendant, Mabrand Carriers Group, Inc., hereby petition for the removal of Plaintiffs' action to this Court, pursuant to 28 U.S.C. §1441 and 1446.

COTTRELL SOLENSKY, P.A.

Attorneys for Defendant Mabrand Carriers Group, Inc.

By:


Floyd G. Cottrell, Esq.

Dated: January 30, 2018